## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

	§	
UNITED STATES SECURITIES	§	
AND EXCHANGE COMMISSION,		§
Plaintiff,	§	
	§	Civil Action No. H-07-2051
v.	§	
	§	COMPLAINT
JEFFREY McMAHON,	§	
	§	
	§	
Defendant.	§	
	§	

Plaintiff Securities and Exchange Commission for its Complaint alleges as follows:

## **SUMMARY**

1. Jeffrey McMahon, a former senior executive of Enron, violated the federal securities laws by participating in an asset parking arrangement in which Enron Corp. purportedly "sold" an interest in Nigerian energy barges to Merrill Lynch, and by disseminating false and misleading information to national credit rating agencies about Enron's business and financial condition.

## **JURISDICTION AND VENUE**

- 2. The Court has jurisdiction over this action pursuant to Sections 21(d), 21(e), and 27 of the Exchange Act [15 U.S.C. §§ 78u(d) and (e) and 78aa].
- 3. Venue lies in this District pursuant to Section 27 of the Exchange Act [15 U.S.C. § 78aa] because certain acts or transactions constituting the violations occurred in this District.
- 4. In connection with the acts, practices, and courses of business alleged herein, McMahon, directly or indirectly, made use of the means and instruments of transportation and